

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

Nationwide Judgment Recovery, Inc. )  
as assignee of Matthew E. Orso, in his )  
capacity as successor court-appointed )  
Receiver for Rex Venture Group, )  
LLC d/b/a ZeekRewards.com for )  
Receiver Kenneth D. Bell )  
Plaintiff, )

v. )

Case No. 3:21-mc-00293-L

Reynaldo P. Perez, )  
SSN xxx-xx-5030 )  
(a member of the Defendant Class of )  
Net Winners) in ZeekRewards.com); )  
Todd Disner, et al, )  
Defendant. )

Robinhood Investments, LLC )  
Garnishee )

**APPLICATION FOR WRIT OF GARNISHMENT AFTER JUDGMENT**

Nationwide Judgment Recovery, Inc. as assignee of Matthew E. Orso, in his capacity as successor court-appointed Receiver for Rex Venture Group, LLC d/b/a ZeekRewards.com for Receiver Kenneth D. Bell files this Application for Writ of Garnishment After Judgment, and in support thereof would respectfully show this Court as follows:

**I. Parties**

1. Plaintiff in garnishment, Nationwide Judgment Recovery, Inc. as assignee of Matthew E. Orso, in his capacity as successor court-appointed Receiver for Rex Venture Group, LLC d/b/a ZeekRewards.com for Receiver Kenneth D. Bell, is the assignee of the judgment debtor, Matthew E. Orso, in his capacity as successor court-appointed Receiver for Rex Venture Group, LLC d/b/a ZeekRewards.com for Receiver Kenneth D. Bell.

2. Garnishee, Robinhood Investments, LLC. is a foreign financial institution and may be served with process by serving its registered agent for service of process Ryan Higgins located at 1401 McKinney, Suite 2250, Houston TX 77010.

## **II. Jurisdiction**

3. This court has subject matter jurisdiction under 28 U.S.C. §1332(a)(2) because the parties are citizens of different states and the amount in controversy exceeds \$75,000.

4. This Court has general personal jurisdiction over Robinhood Investments, LLC. because it has a principal place of business in Texas. Therefore, Robinhood Investments, LLC. has sufficient minimum contacts with the state of Texas sufficient for this Court to exercise personal jurisdiction over Robinhood Investments, LLC.

## **III. Venue**

5. Venue is proper in this district under 28 U.S.C. §1391(a)(1) and (b)(1) because Robinhood Investments, LLC. resides in this district and because a substantial part of the events or omissions giving rise to the claim occurred, or a substantial part of property that is the subject of the action is situated within this district.

## **IV. Factual Background**

6. Affidavit in for Garnishment. Plaintiff has a valid, subsisting judgment against Reynaldo P Perez, defendant in the action styled *Nationwide Judgment Recovery, Inc. as assignee of Matthew E. Orso, in his capacity as successor court-appointed Receiver for Rex Venture Group, LLC d/b/a ZeekRewards.com for Receiver Kenneth D. Bell against Reynaldo P Perez (a member of the Defendant Class of Net Winners in ZeekRewards.com); Todd Disner, et al*, In the United States District Court of the Western District of North Carolina; Cause Number 3:14-cv-00091-GCM in this Court. Specifically, the Court entered a Final Judgment on August 14, 2017 for each Plaintiff in the amount of \$84,647.26 plus judgment interest at 1.22% until paid in full. Reynaldo P Perez, SSN xxx-

xx-5030 does not possess, within Plaintiff's knowledge, property in Texas subject to execution sufficient to satisfy the judgment. This garnishment is not sought to injure Reynaldo P Perez, SSN xxx-xx-5030 and Robinhood Investments, LLC.

7. Based on belief and information, Affiant has reason to believe that Robinhood Investments, LLC. is indebted to Reynaldo P Perez.

**Prayer**

Plaintiff prays that -

- a. a writ of garnishment be issued directed to Robinhood Investments, LLC. as garnishee;
- b. Plaintiff be granted judgment against Robinhood Investments, LLC. as garnishee for the amount now due on Plaintiff's judgment already rendered against Reynaldo P Perez, SSN xxx-xx-5030, together with interest and costs of the suit in the original case and in this garnishment proceeding;
- c. Plaintiff be granted judgment for prejudgment and postjudgment interest at the highest rate allowed by law; and
- d. Plaintiff be granted all further relief to which Plaintiff may be entitled.

RESPECTFULLY SUBMITTED,

A Newark Firm  
1341 W. Mockingbird Lane, Ste 600W  
Dallas, Texas 75247  
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Email: [office@newarkfirm.com](mailto:office@newarkfirm.com)

By: /s/Robert C. Newark, III  
Robert C. Newark, III  
Texas Bar No. 24040097  
Oklahoma Bar No. 21992  
ATTORNEY FOR PLAINTIFF

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**DECLARATION OF ROBERT C. NEWARK, III REGARDING**  
**APPLICATION FOR WRIT OF GARNISHMENT AFTER JUDGMENT**

Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. I am the attorney for the movant, Nationwide Judgment Recovery, Inc. as assignee of Matthew E. Orso, in his capacity as successor court-appointed Receiver for Rex Venture Group, LLC d/b/a ZeekRewards.com for Receiver Kenneth D. Bell., in this proceeding. I have read the Application for Writ of Garnishment After Judgment filed with this Court and the facts contained within it are true and correct.

2. I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 7, 2022.

By/s/Robert C. Newark, III

Robert C. Newark, III

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Garnishee )

TO: Reynaldo P Perez, SSN xxx-xx-5030, 5908 End O Trl, Fort Worth TX 76112

YOU ARE HERBY NOTIFIED that certain property alleged to be owned/held by  
you have been garnished. If you claim any rights in this property, you are advised:

YOU HAVE A RIGHT TO REGAIN POSSESSION OF THE PROPERTY BY  
FILING A REPLEVY BOND. YOU HAVE A RIGHT TO SEEK TO REGAIN  
POSSESSION OF THE PROPERTY BY FILING WITH THE COURT A MOTION TO  
DISSOLVE THIS WRIT.

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By: /s/Robert C. Newark, III  
Robert C. Newark, III  
Texas Bar No. 24040097  
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ATTORNEY FOR PLAINTIFF